

AB:KO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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TO BE FILED UNDER SEAL

UNITED STATES OF AMERICA

- against -

RAY BRITO,

Defendant.

COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF AN APPLICATION FOR
AN ARREST WARRANT

(18 U.S.C. § 2113(a))

No. 23-MJ-1072

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EASTERN DISTRICT OF NEW YORK, SS:

DAVID BONACARTI, being duly sworn, deposes and states that he is a Detective with the New York City Police Department duly appointed according to law and acting as such.

On or about June 14, 2023, within the Eastern District of New York and elsewhere, the defendant RAY BRITO did knowingly and intentionally to take by force, violence and intimidation, from the person and presence of one or more employees of a bank, to wit, a branch of Bank # 1, a financial institution whose identity is known to me, located on Steinway Street, Astoria, New York, money belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

On or about September 22, 2023, within the Eastern District of New York and elsewhere, the defendant RAY BRITO did knowingly and intentionally to take by force, violence and intimidation, from the person and presence of one or more employees of a bank, to wit, a branch of Bank # 2, a financial institution whose identity is known to me, located on 31st

Avenue, Queens, New York, money belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Section 2113(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a detective with the New York City Police Department (“NYPD”) for more than twelve years. Prior to that, I was a police officer with the NYPD for approximately nine years. As a member of the Joint Bank Robbery Task Force, I have participated in numerous investigations relating to bank robberies and similar crimes.

2023 Bank Robberies

2. On June 14, 2023, between approximately 2:45 p.m. and 3:00 p.m. Eastern Daylight Time, a suspect, robbed Bank #1, located on Steinway Street in Astoria, New York (the “Bank #1 Robbery”). According to the bank manager, the robber stated that he had a firearm in his bag and then jammed a hard object into the manager’s back, stating that it was the firearm. The robber then directed the manager to two bank tellers and ordered him to have each teller give the suspect \$10,000 in U.S. currency. The robber then counted the money — \$20,000 dollars in total — and fled the bank. Surveillance camera footage from Bank #1 corroborates the bank manager’s account of the robbery.

3. The deposits of Bank #1 are insured by the Federal Deposit Insurance Corporation.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. Surveillance camera footage shows the robber was wearing distinctive shoes and a watch as well as carrying a black backpack with no identifiable logos. An image of the robber from the Bank #1 Robbery is depicted in Image 1 below:



Image 1

5. Surveillance camera footage from locations near Bank #1 show the robber changing his clothes shortly after leaving the bank and then fleeing on a black bicycle, as depicted in Image 2:



Image 2

6. On September 22, 2023, between approximately 3:30 p.m. and 3:45 p.m. Eastern Daylight Time, the suspect robbed Bank #2, located on 31st Avenue in Queens, New

York (the “Bank #2 Robbery”). The suspect asked to speak to the manager of Bank #2, displayed a firearm that he had pulled out of his bag, and ordered the manager to give him a sum of U.S. currency. The robber then fled the bank with the money given to him.

7. The deposits of Bank #2 are insured by the Federal Deposit Insurance Corporation.

8. Surveillance camera footage shows the robber wearing the same distinctive shoes and a watch as well as carrying a black backpack with no identifiable logos as in the Bank #1 Robbery.

9. Surveillance camera footage from locations near Bank #2 show the robber walking behind a van, out of camera sight, in one set of clothing then departing. He fled on a black bicycle.

Identification of Robber’s Travel Pattern from Robberies and Approximate Destination

10. Surveillance camera footage depicts the robber fleeing the Bank #1 Robbery past the following locations on his bicycle at approximately the following times:²

- a. 30-91 42nd Street, Queens, NY 11103 (40.76072 degrees north, 73.91505 degrees west), between approximately 2:50 pm EDT and 3:05 pm EDT.
- b. 42-09 31st Street, Queens, NY 11103 (40.76058 degrees north, 73.91498 degrees west), between approximately 2:50pm EDT and 3:05 pm EDT.
- c. 41-11 28th Avenue, Queens, NY 11103 (40.76509 degrees north, 73.91227 degrees west), between approximately 2:55pm EDT and 3:10 pm EDT.

² I provide windows of time for each of the locations in order to take into account any imprecision that may be in the time stamps of the surveillance cameras’ footage.

- d. 33-16 Woodside Avenue, Queens, NY 11101 (40.75222 degrees north, 73.91067 degrees west), between approximately 3:00 PM EDT and 3:15 PM EDT.
- e. 39-76 58th Street, Queens, NY 11377 (40.74605 degrees north, 73.90664 degrees west), between approximately 3:05 PM EDT and 3:20 PM EDT.
- f. 38-25 56th Street, Queens, NY 11377 (40.74854 degrees north, 73.90691 degrees west), between approximately 3:05 PM EDT and 3:20 PM EDT.
- g. 38-26 54th Street, Queens, NY 11377 (40.74940 degrees north, 73.90900 degrees west), between approximately 3:05 PM EDT and 3:20 PM EDT.

11. Surveillance camera footage depicts the robber fleeing from the Bank #2 Robbery on a black bicycle past the following locations at approximately the following times, during his flight from the bank:

- a. 78-01 30th Avenue, Queens, NY 11370 (40.7610277 degrees north, 73.8896875 degrees west), between approximately 3:30 pm EDT and 3:45 pm EDT.
- b. 77-12 Northern Boulevard, Queens, NY 11372 (40.7548127 degrees north, 73.8894092 degrees west), between approximately 3:30pm EDT and 3:45 pm EDT.
- c. 77-02 37th Avenue, Queens, NY 11372 (40.7486886 degrees north, 73.8886743 degrees west), between approximately 3:40pm EDT and 3:55 pm EDT.

- d. 93-30 Corona Avenue, Queens, NY 11373 (40.7421727 degrees north, 73.8701499 degrees west), between approximately 3:45 PM EDT and 4:00 PM EDT.
- e. 97-22 Corona Avenue, Queens, NY 11368 (40.7432380 degrees north, 73.8657885 degrees west), between approximately 3:45 PM EDT and 4:00 PM EDT.

12. Surveillance video depicts the robber returning from the Bank #2 Robbery to the residential block of 104th Street between 38th Avenue and 39th Avenue (the “38-39 Block”). The robber can be seen entering the block but is not captured on surveillance footage departing the block.

13. The 38-39 Block contains security cameras showing entrances to the buildings on the block except for two residences, including [REDACTED]. Security cameras from September 22, 2023, do not depict the robber entering any of the houses captured by cameras.

14. Special Agents from the Federal Bureau of Investigation placed a pole camera on the 38-39 Block.

Identification of BRITO

15. On November 30, 2023, an individual was seen leaving [REDACTED] [REDACTED]. He left the residence on a black bicycle matching the black bicycle used by the suspect in each robbery. His shoes, backpack and watch matched the shoes, backpack and watch captured on security footage from each robbery. Upon closer inspection the logos and distinguishing features of the backpack had been covered by black tape to hide any identifying logos or markings.

16. This individual matched the physical of the robber from both robberies. This individual wore two pairs of pants: blue jean pants with white sweatpants as a top layer which fit the pattern of the robber from the Bank #1 Robbery and the Bank #2 Robbery changing his clothes after the robberies to elude the police.

17. I arrested this individual who then identified himself as RAY BRITO; I confirmed BRITO's identity and date of birth with his father, the owner of the residence at 38-11 104th Street.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant RAY BRITO so that he may be dealt with according to law.


DAVID BONACARTI
Special Agent ~~Detective~~
Federal Bureau of Investigation

Subscribed and sworn to before me on December 1, 2023

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